

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

vs.

GREATER GOODS, LLC,

Defendant.

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Case No: 4:21-cv-00988-MTS

PATENT CASE

**PLAINTIFF’S ANSWERS AND DEFENSES TO
DEFENDANT’S COUNTERCLAIMS**

Now comes Plaintiff, Display Technologies, LLC (“Plaintiff,” “Counterclaim Defendant,” or “Display”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal sufficiency thereof and responding only to the factual allegations therein, and states as follows for its Answer and Defenses to Defendant and Counter Plaintiff Greater Goods, LLC’s (“Defendant,” “Counterclaim Plaintiff,” or “Greater Goods”) Counterclaims [Doc. 6] (hereafter the “Counterclaims”) as follows:

PARTIES

1. Display has insufficient knowledge of the allegations contained in paragraph 1 and therefore denies same.
2. Admitted.

JURISDICTION

3. Display incorporates by reference each of its answers in paragraphs 1-2 above.
4. Display admits that jurisdiction is proper.
5. Admitted.

6. Display admits that venue is proper. Display denies any remaining allegations in paragraph 6.

COUNT I

7. Display incorporates by reference each of its answers in paragraphs 1-6 above.

8. Display admits that an actual controversy exists concerning infringement of the ‘723 Patent. Display denies any remaining allegations contained in paragraph 8.

9. Denied.

10. Display admits that Greater Goods seeks a declaratory judgment. Display denies any remaining allegations contained in paragraph 10.

COUNT II

11. Display incorporates by reference each of its answers in paragraphs 1-10 above.

12. Display admits that an actual controversy exists regarding validity of the ‘723 Patent. Display denies any remaining allegations contained in paragraph 12.

13. Denied.

14. Denied.

15. Display admits that Greater Goods seeks a declaratory judgment. Display denies any remaining allegations contained in paragraph 15.

PRAYER FOR RELIEF

To the extent a response is required, Display denies that Greater Goods is entitled to any of the relief requested.

Dated: September 21, 2021

Respectfully submitted,

/s/ Robert J. Vincze

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically on September 21, 2021, and was served via CM/ECF on all counsel who are deemed to have consented to electronic service.

/s/Robert J. Vincze

Robert J. Vincze